

District Judge James L. Robart

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JULIO CURY and TAKAO YAMADA,

Plaintiffs,

v.

DEPARTMENT OF STATE, and
DEPARTMENT OF HOMELAND
SECURITY,

Defendants.

Case No. 2:23-cv-00499-JLR

STIPULATION FOR AN EXTENSION
OF TIME

Noted for Consideration:
August 1, 2024

The Parties have continued to meet and confer to narrow issues. In particular, Plaintiffs have agreed not to litigate the propriety of certain Customs and Border Protection (CBP) withholdings and the State Department (State) has provided additional information and reprocessed certain documents. Further, State has assigned new agency counsel to this matter and thus it took longer than originally anticipated to respond to some of Plaintiffs' inquiries. Because of the ongoing efforts, the parties stipulate and agree to an approximately 40-day extension to the current briefing schedule. The parties submit that there is good cause for this extension based on their ongoing efforts and likelihood that they can further reduce the issues in dispute. The potentially fewer issues in dispute will save the Court time and resources.

Thus, the parties stipulate to and propose the following schedule:

1. The parties will continue to meet and confer, and Plaintiffs will identify any issues Plaintiffs believes are in need of Court resolution by email to Defendants on or before September 6, 2024.
2. Defendants will file their opening summary judgment brief on any identified issues on or before September 27, 2024;
3. Plaintiffs will file their opposition and cross-motion, if any, on or before October 21, 2024;
4. Defendants will file their reply and opposition to any cross-motion, if any, on or before November 12, 2024;
5. and Plaintiffs will file their reply in support of their cross-motion, if any, on or before November 22, 2024.

DATED this 1st day of August, 2024.

Respectfully submitted,

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Attorneys for Defendants

I certify that this memorandum contains 395 words, in compliance with the Local Civil Rules.

[PROPOSED] ORDER

It is so ORDERED.

Dated this _____ day of _____, 2024.

JAMES L. ROBART
United States District Judge